



August 1, 2018

The Hon Marc Garneau, Minister of Transport (mintc@tc.gc.ca)
Transport Canada
330 Sparks Street
Ottawa, ON, K1A 0N5

The Hon. Catherine McKenna, Minister of Environment and Climate Change (ec.ministre-minister.ec@canada.ca)
Environment and Climate Change Canada
200 Sacré-Coeur Boulevard
Gatineau, QC, K1A 0H3

The Hon. Jonathan Wilkinson, Minister of Fisheries and Oceans (min@dfo-mpo.gc.ca)
200 Kent St
Station 15N100
Ottawa, ON, K1A 0E6

Dear Ministers Garneau, McKenna and Wilkinson;

RE: Southern Resident Killer Whale Imminent Threat Assessment

On July 30, 2018 the Department of Fisheries and Oceans posted the Southern Resident Killer Whale (SRKW) Imminent Threat Assessment on the Species at Risk Public Registry.

BC Nature (the Federation of BC Naturalists) represents more than 50 naturalists' clubs and over 6000 members province-wide. We are writing to express our agreement that the Southern Resident Killer Whale population of the Salish Sea faces imminent threats to its survival or recovery in Canada, and that immediate and comprehensive action must be taken. We therefore request that the key federal ministries; Department of Fisheries and Oceans (DFO), Environment and Climate Change Canada (ECCC) and Transport Canada (TC) commence immediate action, as follows:

1. Stop supporting the proposed increase of exported oil from Vancouver (i.e., the new Trans Mountain pipeline). Increased tanker traffic will be the death knell for this Killer Whale population. Even the National Energy Board, in its 2016 report, recognized that Trans Mountain "is likely to result in significant adverse effects to the southern resident killer whale."
2. Increase monitoring of the whale watching industry, keeping boats minimally at the legally prescribed distance, and levelling penalties when they are too close. It may be wise to control the number of licenses and reduce the whale watching flotilla's size in the southern Gulf Islands, Haro Straits and the San Juan Islands. We have evidence from Pender Island residents indicating that they see violations almost everyday, but rarely see Coast Guard or DFO surveillance.

3. Stop commercial vessels - primarily container vessels - using Haro Strait. Other routing options need to be implemented immediately.
4. Mandate vessel slow down. The Port of Vancouver's slow-down trial was just voluntary.
5. Implement immediate and further restrictions on commercial and recreational fishing in the SRKW territory. Coordinate regulations with Washington State.
6. Change legislation to give teeth to all of this.

Killer Whale conservation is also linked to the proposed addition of a second container terminal on Roberts Bank (RBT2). The SRKW come into the area of the existing Deltaport and Westshore terminals. If RBT2 gets approved then the threats to SRKW increase - including increased noise as well as vessel strikes. There is insufficient monitoring of the presence of Killer Whales, and if RBT2 gets approval irreversible damage to the neighbouring ecosystem will occur. Numbers of the Killer Whales primary prey, Chinook salmon, may also decline. Juvenile salmon rely on Roberts Bank as they transition from river to ocean, as they are part of the biofilm food web. The current Deltaport causeway does not have culverts (recommended but ignored by the Port) so there is no tidal flushing. As a result the salmon have to swim around the causeway and pod. A new RBT2 pod and widened causeway would lengthen the salmon's journey. This has been well documented by fisheries experts, but thus far ignored by the Port. BC Nature therefore also strongly suggests that the current Canadian Environmental Assessment Agency Review Panel reject the application for port expansion on Roberts Bank, as it poses too great a threat to the wildlife and ecosystems that depend on the habitats of the Fraser delta and Salish Sea.

I expect that you are aware of the significant public awareness of the plight of these whales. The Canadian Broadcasting Corporation has done several recent reports on the J Pod mother that continues to carry her dead calf. This should be a wake-up call. In Canada there needs to be a better balance between environmental and economic interests. If we were to lose this iconic population it will be a huge international embarrassment to Canada.

Yours truly,



Alan E. Burger, PhD
President: BC Nature
(Federation of BC Naturalists)

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